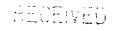


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APPLICATION OF SOUTHWESTERN	§ 8	PUBLIC LIBERTY COMMISSION BEFORE THE STATE OFFICE LAK
ELECTRIC POWER COMPANY FOR	8 §	OF
AUTHORITY TO CHANGE RATES	§	ADMINISTRATIVE HEARINGS

SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S NINTH REQUEST FOR INFORMATION

MARCH 8, 2021

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SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S NINTH REQUEST FOR INFORMATION

Question No. OPUC 9-1:

Please refer to Schedule D-4, sponsored by Mr. Jason Cash and Exhibit MAB-4, sponsored by Mr. Michael Baird.

- a. Please provide the gross plant in service, by FERC account related to Dolet Hills, that was included in the per books plant in service balance as of the end of the test year.
- b. Please reconcile this amount with the gross plant in service balance shown on Exhibit MAB-4.

Response No. OPUC 9-1:

a. & b. The amounts shown in Schedule D-4 are the gross plant balances for Dolet Hills at the end of the test year. Schedule D-4 shows the gross plant balances by FERC account, including an amount for \$1,510,615 that is included in Land (Account 310). Exhibit MAB-4 shows gross plant in service at 6/30/2020 and does not include an amount for land in the balance. Please see OPUC 9-1 Attachment 1.xlsx for a reconciliation between Schedule D-4 and MAB-4.

Prepared By: Jason A. Cash Title: Accounting Sr Mgr

Sponsored By: Michael A. Baird Title: Mng Dir Acctng Policy & Rsrch

SOAH Docket No. 473-21-0538 PUC Docket No. 51415 OPUC's 9th RFI, Q. # OPUC 9-1 Attachment 1 Page 1 of 1

Southwestern Electric Power Company Reconciliation of Dolet Hill Gross Plant Balance Schedule D-4 to Exhibit MAB-4

Assaunt	Descr	Schedule D-4 3/31/2020	Exhibit MAB-4 6/30/2020
Account			0/30/2020
310	Land and Land Rights	\$1,510,614.56	
311	Structures and Improvements	\$57,023,545.35	\$57,127,514.45
312	Boiler Plant Equipment	\$211,135,254.27	\$211,216,144.27
314	Turbogenerator Units	\$39,735,805.44	\$39,735,805.44
315	Accessory Electric Equipment	\$12,572,795.92	\$12,575,554.22
316	Misc Power Plant Equipment	\$16,666,081.70	\$16,666,081.70
317	ARO Steam Production Plant-Ash Pond	\$1,257,350.43	\$1,257,350.43
317	ARO Steam Prod. Plant & Lignite Mine	(\$26,692.91)	(\$26,692.91)
	Amounts Shown on Schedule D-4 and Exhibit MAB-4	\$339,874,754.76	\$338,551,757.60
	Include Account 310 to Exhibit MAB-4		\$1,510,614.56
	Gross Plant Balances Including Account 310	\$339,874,754.76	\$340,062,372.16

SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S NINTH REQUEST FOR INFORMATION

Question No. OPUC 9-2:

Please refer to Schedule B-1 and Exhibit MAB-4, both sponsored by Mr. Michael Baird.

- a. Please provide the accumulated depreciation and amortization balance related to Dolet Hills that was included in the per books accumulated depreciation balance as of the end of the test year.
- b. Please provide the amount included in the proforma adjustment to accumulated depreciation that is related to Dolet Hills.
- c. Please reconcile these amounts with the accumulated depreciation shown on Exhibit MAB-4 for Dolet Hills.

Response No. OPUC 9-2:

- a. \$227,615,789
- b. The most significant proforma adjustment to accumulated depreciation adjusts the total company accumulated depreciation balances as if only Texas depreciation rates were applied. This jurisdictional accumulated depreciation adjustment on WP B-1.5.4 decreases Total Company Accumulated Depreciation \$224,168,819. This adjustment is calculated at the functional level and allocating this adjustment specifically to Dolet Hills Plant is not appropriate. No amount of this adjustment was considered on Exhibit MAB-4 as the revenue requirement impact associated with this adjustment is separately and fully considered in the depreciation study and rate base determination.
 - The proforma adjustment for Dolet ADIT Offset to increase Accumulated Depreciation \$82,311,412 on WP B-1.5.17 agrees with the amount on MAB-4. See the testimony of Mr. Thomas Brice and Mr. Michael Baird where this adjustment is discussed. Other proforma adjustments on Schedule B-1 to Accumulated Depreciation are not significant to Exhibit MAB-4.
- c. See b. above for discussion of proforma adjustments. See OPUC 9-2 Attachment 1.xlsx

Prepared By: Tiffany A. Powell Day

Title: Regulatory Acetg Case Mgr

Sponsored By: Michael A. Baird Title: Mng Dir Acctng Policy & Rsrch

Southwestern Electric Power Company Reconciliation of Dolet Hills Accumulated Depreciation Balance Schedule B-1 to Exhibit MAB-4

Reconciliation Accum Depr Account 108 to MAB-4			
Accumulated Prov for Depr Account 108 Dolet Hills as of 3/31/2020	227,615,789	(a)	
Account 1080161 activity April to June 2020	20,637,328	per Staff 5-59 Attachment 1	
Est. 3 months depr exp per MAB-4 per below	2,022,987	(b)	
Unreconciled diff related to rough Depreciation estimate below	(153,404)		
Accumulated Prov for Depr Account 108 Dolet Hills per MAB-4 as of 6/30/2020	250,122,699		
(a) PowerPlant Report - Dolet Hills Accumulated Depreciation Acct 108 3/31/2020			
31000 - Land - Coal Fired	-		
31100 - Structures, Improvemnt-Coal	50,009,996		
31200 - Boiler Plant Equip-Coal	122,971,477		
31400 - Turbogenerator Units-Coal	31,520,737		
31500 - Accessory Elect Equip-Coal	9,951,770		
31600 - Misc Pwr Plant Equip-Coal	12,751,800		
31700 - ARO Steam Production Plant	410,008		
	227,615,789		
(b) Estimated 3 months depr exp per MAB-4	Gross Plant	Depr Rate	3 mos. Depr Est
31100 - Structures, Improvemnt-Coal	57,127,514	2.00%	285,638
31200 - Boiler Plant Equip-Coal	211,216,144	2.36%	1,246,175
31400 - Turbogenerator Units-Coal	39,735,805	2.13%	211,593
31500 - Accessory Elect Equip-Coal	12,575,554	2.10%	66,022
31600 - Misc Pwr Plant Equip-Coal	16,666,082	2.39%	99,580
31700 - ARO Steam Production Plant	1,257,350	37.57%	118,105
31700 - ARO Steam Production Plant	(26,693)	61.83%	(4,126)
	338,551,758		2,022,987

SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S NINTH REQUEST FOR INFORMATION

Question No. OPUC 9-3:

Please refer to SWEPCO's response to Staff RFI No. 5-59, sponsored by Mr. Michael Baird. Please provide the date on which SWEPCO began depreciating Dolet Hills based on a planned retirement of December 2021 for book purposes. Please include in your response whether the depreciation shown for January and February 2020 is based on the Public Utility Commission of Texas' approved depreciation rate or is in addition to the authorized monthly depreciation.

Response No. OPUC 9-3:

For Generally Accepted Accounting Principles (GAAP) reporting proposes only, the Company began depreciating the Dolet Hills Plant over its useful life of December 2026 in January 2020 and updated to its current useful life of December 2021 in March 2020. The adjustment shown for February all months through September 2020 January, and Staff 5-59 Attachment 1 Dolet Hills GAAP entries.xlsx] is recorded as a debit to account 1080161 and effectively reverses the additional GAAP depreciation required due to the change to a shorter plant life discussed above. By netting the 1080161 account against account 1080001, which is based on the shorter GAAP life, the total accumulated depreciation balance for all Dolet Plant 108 balances represents utilization of PUCT approved depreciation rates.

Prepared By: Michael A. Baird Title: Mng Dir Acctng Policy & Rsrch

Prepared By: Jason A. Cash Title: Accounting Sr Mgr

Sponsored By: Michael A. Baird Title: Mng Dir Acctng Policy & Rsrch

SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S NINTH REQUEST FOR INFORMATION

Question No. OPUC 9-4:

Please refer to Exhibit MAB-4, sponsored by Mr. Michael Baird.

- a. Please provide the FERC account in which the Demolition Estimate for Dolet Hills of \$10,740,383 has been included in the adjusted test year.
- b. Please admit or deny whether any of these costs were in the test year per books balances.

Response No. OPUC 9-4:

- a. SWEPCO has not recorded any actual demolition costs for Dolet Hills as no costs have been incurred as of the end of the test year. The \$10,740,383 estimate will be incurred by SWEPCO for the Dolet Hills Plant after the plant is retired and charged to FERC account 1080011.
- b. SWEPCO's test year depreciation expense, as adjusted, includes a portion of estimated demolition costs related to the current test year. SWEPCO's approved depreciation rates allow for recovery of the estimated demolition costs over the life of the plant. As the portion of estimated demolition costs are recorded to depreciation expense, SWEPCO credits account 1080011 which has reduced the Net Book value to \$82,291,276 on Exhibit MAB-4. See also response to OPUC 9-2 subpart b. regarding rate base proforma B-1.5.11.

Prepared By: Michael A. Baird Title: Mng Dir Acctng Policy & Rsrch

Prepared By: Jason A. Cash Title: Accounting Sr Mgr

Sponsored By: Michael A. Baird Title: Mng Dir Acctng Policy & Rsrch

APPLICATION OF SOUTHWESTERN	§	BEFORE THE STATE OFFICE
ELECTRIC POWER COMPANY FOR	§ §	OF
AUTHORITY TO CHANGE RATES	§	ADMINISTRATIVE HEARINGS

SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S NINTH REQUEST FOR INFORMATION

MARCH 8, 2021

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Response No. OPUC 9-6	51415 OPUC09 Pkg.pdf	

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OPUC_9-2_Attachment_1

OPUC_9-5_Attachment_1

SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S NINTH REQUEST FOR INFORMATION

Question No. OPUC 9-1:

Please refer to Schedule D-4, sponsored by Mr. Jason Cash and Exhibit MAB-4, sponsored by Mr. Michael Baird.

- a. Please provide the gross plant in service, by FERC account related to Dolet Hills, that was included in the per books plant in service balance as of the end of the test year.
- b. Please reconcile this amount with the gross plant in service balance shown on Exhibit MAB-4.

Response No. OPUC 9-1:

a. & b. The amounts shown in Schedule D-4 are the gross plant balances for Dolet Hills at the end of the test year. Schedule D-4 shows the gross plant balances by FERC account, including an amount for \$1,510,615 that is included in Land (Account 310). Exhibit MAB-4 shows gross plant in service at 6/30/2020 and does not include an amount for land in the balance. Please see OPUC 9-1 Attachment 1.xlsx for a reconciliation between Schedule D-4 and MAB-4.

Prepared By: Jason A. Cash Title: Accounting Sr Mgr

Sponsored By: Michael A. Baird Title: Mng Dir Acctng Policy & Rsrch

Southwestern Electric Power Company Reconciliation of Dolet Hill Gross Plant Balance Schedule D-4 to Exhibit MAB-4

Account	Descr	Schedule D-4 3/31/2020	Exhibit MAB-4 6/30/2020
310	Land and Land Rights	\$1,510,614.56	
311	Structures and Improvements	\$57,023,545.35	\$57,127,514.45
312	Boiler Plant Equipment	\$211,135,254.27	\$211,216,144.27
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317	ARO Steam Prod. Plant & Lignite Mine	(\$26,692.91)	(\$26,692.91)
	Amounts Shown on Schedule D-4 and Exhibit MAB-4 Include Account 310 to Exhibit MAB-4	\$339,874,754.76	\$338,551,757.60 \$1,510,614.56
	Gross Plant Balances Including Account 310	\$339,874,754.76	\$340,062,372.16

SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S NINTH REQUEST FOR INFORMATION

Question No. OPUC 9-2:

Please refer to Schedule B-1 and Exhibit MAB-4, both sponsored by Mr. Michael Baird.

- a. Please provide the accumulated depreciation and amortization balance related to Dolet Hills that was included in the per books accumulated depreciation balance as of the end of the test year.
- b. Please provide the amount included in the proforma adjustment to accumulated depreciation that is related to Dolet Hills.
- c. Please reconcile these amounts with the accumulated depreciation shown on Exhibit MAB-4 for Dolet Hills.

Response No. OPUC 9-2:

- a. \$227,615,789
- b. The most significant proforma adjustment to accumulated depreciation adjusts the total company accumulated depreciation balances as if only Texas depreciation rates were applied. This jurisdictional accumulated depreciation adjustment on WP B-1.5.4 decreases Total Company Accumulated Depreciation \$224,168,819. This adjustment is calculated at the functional level and allocating this adjustment specifically to Dolet Hills Plant is not appropriate. No amount of this adjustment was considered on Exhibit MAB-4 as the revenue requirement impact associated with this adjustment is separately and fully considered in the depreciation study and rate base determination.
 - The proforma adjustment for Dolet ADIT Offset to increase Accumulated Depreciation \$82,311,412 on WP B-1.5.17 agrees with the amount on MAB-4. See the testimony of Mr. Thomas Brice and Mr. Michael Baird where this adjustment is discussed. Other proforma adjustments on Schedule B-1 to Accumulated Depreciation are not significant to Exhibit MAB-4.
- c. See b. above for discussion of proforma adjustments. See OPUC 9-2 Attachment 1.xlsx

Prepared By: Tiffany A. Powell Day

Title: Regulatory Acetg Case Mgr

Sponsored By: Michael A. Baird Title: Mng Dir Acctng Policy & Rsrch

Southwestern Electric Power Company Reconciliation of Dolet Hills Accumulated Depreciation Balance Schedule B-1 to Exhibit MAB-4

Reconciliation Accum Depr Account 108 to MAB-4			
Accumulated Prov for Depr Account 108 Dolet Hills as of 3/31/2020	227,615,789	(a)	
Account 1080161 activity April to June 2020	20,637,328	per Staff 5-59 Attachment 1	
Est. 3 months depr exp per MAB-4 per below	2,022,987	(b)	
Unreconciled diff related to rough Depreciation estimate below	(153,404)	. ,	
Accumulated Prov for Depr Account 108 Dolet Hills per MAB-4 as of 6/30/2020	250,122,699		
(a) PowerPlant Report - Dolet Hills Accumulated Depreciation Acct 108 3/31/2020			
31000 - Land - Coal Fired	-		
31100 - Structures, Improvemnt-Coal	50,009,996		
31200 - Boiler Plant Equip-Coal	122,971,477		
31400 - Turbogenerator Units-Coal	31,520,737		
31500 - Accessory Elect Equip-Coal	9,951,770		
31600 - Misc Pwr Plant Equip-Coal	12,751,800		
31700 - ARO Steam Production Plant	410,008		
	227,615,789	•	
(b) Estimated 3 months depr exp per MAB-4	Gross Plant	Depr Rate	3 mos. Depr Est
31100 - Structures, Improvemnt-Coal	57,127,514	2.00%	285,638
31200 - Boiler Plant Equip-Coal	211,216,144	2.36%	1,246,175
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31500 - Accessory Elect Equip-Coal	12,575,554	2.10%	66,022
31600 - Misc Pwr Plant Equip-Coal	16,666,082	2.39%	99,580
31700 - ARO Steam Production Plant	1,257,350	37.57%	118,105
31700 - ARO Steam Production Plant	(26,693)	61.83%	(4,126)
	338,551,758	:	2,022,987

SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S NINTH REQUEST FOR INFORMATION

Question No. OPUC 9-3:

Please refer to SWEPCO's response to Staff RFI No. 5-59, sponsored by Mr. Michael Baird. Please provide the date on which SWEPCO began depreciating Dolet Hills based on a planned retirement of December 2021 for book purposes. Please include in your response whether the depreciation shown for January and February 2020 is based on the Public Utility Commission of Texas' approved depreciation rate or is in addition to the authorized monthly depreciation.

Response No. OPUC 9-3:

For Generally Accepted Accounting Principles (GAAP) reporting proposes only, the Company began depreciating the Dolet Hills Plant over its useful life of December 2026 in January 2020 and updated to its current useful life of December 2021 in March 2020. The adjustment shown for January, February and all months through September 2020 [Staff 5-59 Attachment 1 Dolet Hills GAAP entries.xlsx] is recorded as a debit to account 1080161 and effectively reverses the additional GAAP depreciation required due to the change to a shorter plant life discussed above. By netting the 1080161 account against account 1080001, which is based on the shorter GAAP life, the total accumulated depreciation balance for all Dolet Plant 108 balances represents utilization of PUCT approved depreciation rates.

Prepared By: Michael A. Baird Title: Mng Dir Acctng Policy & Rsrch

Prepared By: Jason A. Cash Title: Accounting Sr Mgr

Sponsored By: Michael A. Baird Title: Mng Dir Acctng Policy & Rsrch

SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S NINTH REQUEST FOR INFORMATION

Question No. OPUC 9-4:

Please refer to Exhibit MAB-4, sponsored by Mr. Michael Baird.

- a. Please provide the FERC account in which the Demolition Estimate for Dolet Hills of \$10,740,383 has been included in the adjusted test year.
- b. Please admit or deny whether any of these costs were in the test year per books balances.

Response No. OPUC 9-4:

- a. SWEPCO has not recorded any actual demolition costs for Dolet Hills as no costs have been incurred as of the end of the test year. The \$10,740,383 estimate will be incurred by SWEPCO for the Dolet Hills Plant after the plant is retired and charged to FERC account 1080011.
- b. SWEPCO's test year depreciation expense, as adjusted, includes a portion of estimated demolition costs related to the current test year. SWEPCO's approved depreciation rates allow for recovery of the estimated demolition costs over the life of the plant. As the portion of estimated demolition costs are recorded to depreciation expense, SWEPCO credits account 1080011 which has reduced the Net Book value to \$82,291,276 on Exhibit MAB-4. See also response to OPUC 9-2 subpart b. regarding rate base proforma B-1.5.11.

Prepared By: Michael A. Baird Title: Mng Dir Acctng Policy & Rsrch

Prepared By: Jason A. Cash Title: Accounting Sr Mgr

Sponsored By: Michael A. Baird Title: Mng Dir Acctng Policy & Rsrch

SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S NINTH REQUEST FOR INFORMATION

Question No. OPUC 9-5:

Please refer to Exhibit MAB-4, sponsored by Mr. Michael Baird. Please provide the monthly capital amounts for Dolet Hills that were classified as plant in service for the period April 2020 to the most recent monthly information available. Please provide this information by FERC account.

Response No. OPUC 9-5:

Please see OPUC 9-5 Attachment 1.xlsx.

Prepared By: Jason A. Cash Title: Accounting Sr Mgr

Sponsored By: Michael A. Baird Title: Mng Dir Acctng Policy & Rsrch

SOAH Docket No. 473-21-0538
PUC Docket No. 51415
OPUC's 9th RFI, Q. # OPUC 9-5
Attachment 1
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FERC

Southwestern Electric Power Company
Plant In Service Additions to Dolet Hill Plant
For the Periods April 2020 through January 2021

			Activity	
Location	Utility Account	Depr Group	Month Code	Activity Cost
Dolet Hills Generating Plant	31500 - Accessory Elect Equip-Coal	SEP 101/6 315 Dolet Hills Plant	202004 Addition	\$1,964.71
Dolet Hills Generating Plant	31100 - Structures, Improvemnt-Coal	SEP 101/6 311 Dolet Hills Plant	202005 Addition	\$107,786.74
Dolet Hills Generating Plant	31200 - Boiler Plant Equip-Coal	SEP 101/6 312 Dolet Hills Plant	202005 Addition	\$81,451.48
Dolet Hills Generating Plant	31500 - Accessory Elect Equip-Coal	SEP 101/6 315 Dolet Hills Plant	202005 Addition	\$793.59
Dolet Hills Generating Plant	31100 - Structures, Improvemnt-Coal	SEP 101/6 311 Dolet Hills Plant	202007 Addition	\$5,523.97
Dolet Hills Generating Plant	31100 - Structures, Improvemnt-Coal	SEP 101/6 311 Dolet Hills Plant	202008 Addition	\$237.43
Dolet Hills Generating Plant	31100 - Structures, Improvemnt-Coal	SEP 101/6 311 Dolet Hills Plant	202009 Addition	\$315,028.06
Dolet Hills Generating Plant	31200 - Boiler Plant Equip-Coal	SEP 101/6 312 Dolet Hills Plant	202009 Addition	\$65,403.63
Dolet Hills Generating Plant	31200 - Boiler Plant Equip-Coal	SEP 101/6 312 Dolet Hills Plant	202010 Addition	(\$425.92)
Dolet Hills Generating Plant	31500 - Accessory Elect Equip-Coal	SEP 101/6 315 Dolet Hills Plant	202010 Addition	\$97.17
Dolet Hills Generating Plant	31700 - ARO Steam Production Plant	SEP 101/6 31700 Dolet Hills Ash	202012 Addition	\$1,959,025.51
Dolet Hills Generating Plant	31100 - Structures, Improvemnt-Coal	SEP 101/6 311 Dolet Hills Plant	202101 Addition	(\$4,172.41)

\$2,532,713.96

SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S NINTH REQUEST FOR INFORMATION

Question No. OPUC 9-6:

Please refer to SWEPCO's response to OPUC RFI No. 5-1, sponsored by Ms. Amy Jeffries. Please provide the actual fuel inventory level related to Dolet Hills by month for the period June 2020 through the most current information available. Please provide this information in tons and recorded dollar value.

Response No. OPUC 9-6:

Dolet Hills Inventory Balances - SWEPCO's Share:

<u>Month</u>	<u>Dollars</u>	<u>Tons</u>
Jun-20	66,775,268	348,034
Jul-20	76,059,142	355,975
Aug-20	92,297,287	366,534
Sep-20	94,741,903	343,262
Oct-20	92,555,780	313,970
Nov-20	95,486,656	317,467
Dec-20	97,885,651	318,975
Jan-21	105,435,577	336,998

Prepared By: Michael H. Ward Title: Regulatory Consultant Staff

Sponsored By: Amy E. Jeffries Title: Coal Procurement Mgr